

REMARKS

Claims 1-10 are pending in the application; all claims were rejected under 35 U.S.C. §102(e) as being anticipated by Ferrel, et al., U.S. Patent No. 6,230,173.

Applicant has amended claims 1 and 2 of the application for clarity and
5 requests reconsideration in light of these amendments and the following discussion.

Applicant notes that Ferrel, et al. U.S. Patent No. 6,230,173 was not listed in the Notice of References Cited (although two other Ferrel references were).

Applicant requests that the next response from the USPTO include this reference as having been considered by the Examiner.

10 Applicant further notes that the Examiner has based aspects of the rejection to claim 1 on language that does not take into account the changes made in Amendment B, mailed on January 22, 2003. Applicant respectfully requests that the amended claim language above, which incorporates the Amendment B changes, be utilized in consideration of this response.

15 **35 U.S.C. §102(e), CLAIMS 1-10 ANTICIPATION BY FERREL**

1. Ferrel fails to teach each and every element of amended claim 1, nor is the present invention obviated by Ferrel.

Ferrel discloses an Object Linking and Embedding (OLE) architecture defining a storage model (OLE structured storage) in which a single file (OLE file) is
20 internally structured in what is known as "storages and streams" (column 1, lines 44-49; "same fine", "single file system entity"). The MDF file mentioned in Ferrel is such an OLE file in which a single storage object contains Text Content in a Multimedia Publishing Markup Language (MPML) (see, for example, abstract or column 1, lines 55-60).

Ferrel does not teach that a group of pages files that are then transferred to a server would be generated from data records of an author file as well as further data record structured files.

The identification of the author file or, respectively, the data record-structured
5 files with a “stored title” or, respectively, with “text and objects” in Ferrel does not take into account that both author files and the data record-structured files according to claim 1 are data set-structured files; and that for a respective data record – and not only for a respective file – respectively one page file is generated. Ferrel fails to teach a generation of a whole group of page files from individual data sets of an
10 author file and further data record-structured files.

Although Ferrel discloses that “content” can be linked with a “title”; Ferrel fails to teach that a data record of a respective file is identified by such a link.

Moreover, the generated page files to be transferred onto the Server in Ferrel can not be identified with the objects designated as an “MPML file” as noted by the
15 Examiner. In this context, such an “MPML file” is not disclosed in Ferrel. Rather, the term “MPML” in Ferrel is exclusively used in connection with text formatted in MPML that is stored as a storage object in a single MDF file (see, for example, abstract or column 1, lines 55-60). However, as arises from column 24, lines 16-54 in Ferrel, an MDF file is not generated and transferred onto the server, but rather
20 serves as a starting point for the generation of the data to be transferred onto the server. In no way can one learn from Ferrel that a group of different MDF files would be transferred as page files onto the server. In addition to this, Ferrel fails to disclose that an MDF file contains a link referring to another MDF file. However, the latter is a significant element of the generated page files according to claim 1.

A generation of a group of page files according to claim 1 is also not suggested by Ferrel, since the interoperability of the OLE architecture forming the basis of Ferrel directly requires that various applications store their various data objects in the same OLE file (see column 1, lines 40-46). The data objects of a single OLE file can, moreover, not be identified with real page markup-language-formatted files, since a readout of these data objects - in contrast to real page files – requires a specific OLE-capable program. In particular, the embedded data objects of an OLE file – different than real page markup-language-formatted files – is generally not suited for access via a browser. The latter is indirectly acknowledged by Ferrel in column 3, lines 11-15. Ferrel even teaches away from the use of SGML or HTML to create and display documents in Ferrel (see, for example, column 2, lines 62-64).

Furthermore, Ferrel fails to teach that a page markup language specific link referencing between page files would be generated from a reference information contained in the author file, whereby the reference information refers to a data record and the generated link refers to a page file. Only non-specific links between various “objects” are mentioned in Ferrel; however, nothing is said about how these links are generated. Additionally, Ferrel fails to disclose that page files stored on the server, on not just “objects”, would be addressed by these generated links. Rather, Ferrel teaches, at column 4, lines 1-8 (“transferring the document to the server computer”) that a plurality of such objects are combined into a single document, and this single document is transferred to the server (see also Figure 11). However, no page file on the server is addressed by an internal link between various objects contained in such a document.

For these reasons, Ferrel fails to teach each and every element of claim 1, as amended.

Claim 2 essentially states that the data record-structured files (meaning not only the author file in claim 1) can also contain reference information via which data records of other data record structured files are identified. Claim 3 essentially states that the author file can also contain reference information via which data records of the same author file (meaning not only data records of other files) are identified.

Ferrel fails to teach that an object identified with the data record-structured files, as equated by the Examiner the arguments regarding claim 1, contains, for its part, reference information regarding others of such objects, or that an object identified with the author file, as argued by the Examiner regarding claim 1, contained, for its part, reference information regarding other data records of the same author file.

With regard to claim 4, and based on claim 1 (from which claim 4 depends), the author file is one of these files from which the page files are generated. In discussing claim 1, the Examiner identifies a page file with an "MPML object". However, in Ferrel, MPML-formatted text objects are always contained in MDF files and can thus not be understood as being generated from them (see, for example, column 3, lines 55-60). The identification of the author file with an MDF file as equated by the Examiner is thus logically inconsistent with the argumentation regarding claim 1.

With regard to claim 5, states that reference information about files that are free of data records can also be inserted. The data set-free files described in claim

5 are identified by the Examiner with the same files as the data record structured files in claim 1. However, such an equating is logically inconsistent, since a file can not simultaneously be data record-structured and free of data records.

5 With regard to claim 6, for insertion of reference information referring to a data record of a reference file, “structure addresses” of the reference file are visualized in order to select one of the structure addresses. In contrast to this, in Ferrel, no indication is found that, for insertion of reference information that refers to a data record of a reference file, its structure addresses are visualized for selection
10 purposes.

With regard to claim 7, Ferrel fails to teach the generation of a URL referring to this page file initiated by selecting a data record that is already stored as a page file on the server.

With regard to claim 9, a data record-structured file can only be addressed in
15 the authoring system – meaning not in the server – when the respectively associated page files are already stored on the server. This means that, as long as page files associated with a data record-structured file are not yet stored on the server, this data record-structured file is not addressable in the authoring system. Furthermore according to claim 9, a page file is only transferred when it is not yet stored or when
20 it has been changed.

Finally, with regard to claim 10, claim 10 describes a display of the page files with navigation control fields that allow a scrolling between the page files without using a corresponding forward function of the page access device (browser).

However, in Ferrel no teaching is found that navigation fields not proprietary to the browser would be used for scrolling.

For all of these reasons, the Applicant asserts that the amended claim language clearly distinguishes over the prior art, and respectfully request that the


5 Examiner withdraw the §102 rejection from the present application.

CONCLUSION

Inasmuch as each of the objections have been overcome by the amendments, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered,

10 the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

 (Reg. No. 45,877)

Mark Bergner
SCHIFF HARDIN & WAITE
PATENT DEPARTMENT
6600 Sears Tower
Chicago, Illinois 60606-6473
(312) 258-5779
Attorney for Applicants
Customer Number 26574

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30 Mark Bergner Attorney for Applicants